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Country of Origin Labeling Program
AMS, USDA, Stop 0249, Room 2092-S
1400 Independence Avenue SW
Washington, DC 20250-0249

Dear Sir or Madam,

Thank you for giving us the opportunity to comment on the COOL legislation. We are cow/calf producers from Montana.

Currently there is a Beef Quality Assurance Program in place in Montana that is for Born, Raised and slaughtered tracking. BQA was designed by producers to determine end product uniformity and quality. The individual animal ID makes it possible to track a single or group of animals from the ranch, to feeder, to packer. The information gathered at the time of slaughter is then available to the producer from an individual or a group of carcasses.

Producers participating in the BQA program implant an electronic chip or an ear tag in each individual animal at birth. That animal carries that ID until slaughter so that carcass data can be gathered and reported back to the producer. Other systems widely used by a cow / calf producers are the Brucellosis tattooing by veterinarians of breeding age females. These tattoos are used as origin reference. And the hot iron branding of calves. One of these ID systems and data would need to proceed on with the carcass from the packer to the retailer. Which should be neither time consuming nor expensive. It is my understanding that the packers already have labeling systems in effect. Meats that are of undeterminable origin should be labeled undetermined origin. Or treated as by-product meats.

With the tried and proven individual identification programs that are already in place I believe it is the responsibility of the packer to keep these ID's and data with the individual carcasses to be passed on to the retailer. The issue seems to be more a matter of packer compliance than a costly matter of tracking origin.

I do not believe there would be discrimination against foreign meats if the quality of the meat is sufficient. Foreign meats will sell in the super market proudly displaying Country of Origin Labeling right beside meats of United States origin if the quality is good.

In closing: As producers, it is our right to market our products with Country of Origin Labeling.

As consumers, we have a right to buy beef with a label of Country of Origin, equivalent the other foods we buy already labeled with Country of Origin.

And lastly as a wife and mother, I have the right to know where the foods that I buy and prepare for my family originated.

Thank you for your support of Country of Origin Labeling.

Sincerely,

Nancy Brence